

EXHIBIT F

From: [Dean McConnell](#)
To: [Mark Walters](#); [Laurie Gero](#); ggordon@geistlaw.com; fenton@eflawyers.com
Cc: rtk@barrettlaw.com; [Heather N. Warner](#)
Subject: RE: Global Archery Products, Inc. v. Jordan Gwyther, No. 1:15-cv-00297-JVB-SLC
Date: Thursday, April 14, 2016 6:40:03 PM

Mark:

I will check my client's schedule and let you know. I think your notice is premature given the pending issues to dismiss the case for lack of personal jurisdiction. I don't think any deposition needs to take place until the Court's ruling on that issue. Your pressure to proceed only supports our position that you have waived jurisdictional challenges.

Dean

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Mark Walters <walters@lowegrahamjones.com>
Date: 4/14/16 7:03 PM (GMT-05:00)
To: Dean McConnell <dean@dean-mcconnell.com>, Laurie Gero <gero@lowegrahamjones.com>, ggordon@geistlaw.com, fenton@eflawyers.com
Cc: rtk@barrettlaw.com, "Heather N. Warner" <hnrw@barrettlaw.com>
Subject: RE: Global Archery Products, Inc. v. Jordan Gwyther, No. 1:15-cv-00297-JVB-SLC

Dean:

Can you please confirm that you will make Mr. Jackson available for deposition at the noticed date, time, and place? Please understand that there is no requirement for Defendant to conduct a deposition under Rule 30(b)(6). Rule 30(a)(1) states that "[a] party may, by oral questions, depose any person, including a party, without leave of court except as provided in Rule 30(a)(2)." There is no requirement in the rule for the notice to contain the subject of inquiry. If Mr. Jackson believes the deposition is improper, he has the burden to move for a protective order and if he fails to appear, he could face sanctions. *See* Rule 37(d)(2); *see also* *Odongo v. City of Indianapolis*, No. 1:14-cv-00710-TWP-MJD 2015 U.S. Dist. LEXIS 31535 (S.D. Ind. March 13, 2015).

Sincerely,

Mark.

From: Dean McConnell [<mailto:dean@dean-mcconnell.com>]
Sent: Friday, April 01, 2016 4:29 PM
To: Laurie Gero; ggordon@geistlaw.com; fenton@eflawyers.com
Cc: Mark Walters; rtk@barrettlaw.com; Heather N. Warner
Subject: RE: Global Archery Products, Inc. v. Jordan Gwyther, No. 1:15-cv-00297-JVB-SLC

This deposition notice is deficient. It does not state what Mr. Jackson is supposed to testify to or what the deposition is about. Mr. Jackson will not appear until such time that a proper notice is issued. A 30 (b)(6) deposition notice is required.

Dean

Sent from my Verizon Wireless 4G LTE smartphone

----- Originalmessage-----

From: Laurie Gero <gero@lowegrahamjones.com>

Date: 4/1/2016 6:40 PM (GMT-05:00)

To: Dean McConnell <dean@dean-mcconnell.com>, ggordon@geistlaw.com,
fenton@eflawyers.com

Cc: Mark Walters <walters@lowegrahamjones.com>, rtk@barrettlaw.com, "Heather N. Warner" <hww@barrettlaw.com>

Subject: Global Archery Products, Inc. v. Jordan Gwyther, No. 1:15-cv-00297-JVB-SLC

Counsel,

Attached please find service copies of:

- Notice of Deposition of John Jackson

Please let us know if you have any trouble opening the attachment.

Thank you,

Laurie Gero
Paralegal/Docketing
LOWE GRAHAM JONES
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